

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROYAL PARK INVESTMENTS SA/NV,

Plaintiff,

v.

HSBC BANK USA, NA, as Trustee,

Defendants.

BLACKROCK BALANCED CAPITAL
PORTFOLIO (FI), *et al.*,

Plaintiffs,

v.

HSBC BANK USA, NATIONAL
ASSOCIATION,

Defendant,

-and-

The Trusts Identified in Exhibit 1,

Nominal Defendants.

PHOENIX LIGHT SF LIMITED, *et al.*,

Plaintiffs,

v.

HSBC BANK USA, N.A.,

Defendants.

NATIONAL CREDIT UNION
ADMINISTRATIVE BOARD, *et al.*,

Plaintiffs,

v.

HSBC BANK USA, NATIONAL
ASSOCIATION,

Defendants.

Case No. 14-cv-8175-SAS

JURY DEMAND

Case No. 14-cv-9366-SAS

JURY DEMAND

Case No. 14-cv-10101-SAS

JURY DEMAND

Case No. 15-cv-2144-SAS

JURY DEMAND

JOINT [PROPOSED] SCHEDULING ORDER

SHIRA A. SCHEINDLIN, U.S.D.J.:

WHEREAS, on June 24, 2015, the Court held a status conference in the above-captioned actions at which the Court directed the parties to meet and confer and to submit a joint proposed scheduling order;

WHEREAS, counsel for the parties have met and conferred and have reached an agreement as to certain matters set forth below;

WHEREAS, after a good faith effort, counsel for the parties were unable to reach an agreement as to the nature of certain expert disclosures set forth in section (5)(a) below;

NOW, THEREFORE, the parties hereby submit the following proposed joint pre-trial scheduling order for the Court's approval:

(1) The date by which Plaintiffs will identify loans for loan file review, including loans to be re-underwritten:

60 days after production of the Mortgage Loan Schedules.

(2) The date by which the parties will complete production of documents:

November 20, 2015.

(3) Class Certification Schedule:

(a) The date by which Plaintiffs will move for class certification:

Not later than March 18, 2016.

(b) The date by which Defendant will file its opposition to the motion for class certification:

45 days after the filing of the Class Certification Motion.

(c) The date by which Plaintiffs will file any reply in support of the motion for class certification:

30 days after the filing of the Class Certification Opposition Brief.

(4) The date by which the parties will complete fact discovery:

May 27, 2016.

(5) Expert Discovery Schedule: The parties agree as to the dates for expert disclosures but were unable to reach an agreement as to the nature of certain expert disclosures, as set forth in sub-section (a) below:

	Date	Plaintiffs' Proposal	Defendant's Proposal
(a)	June 20, 2016	Date for parties to identify experts and areas of expert testimony pursuant to Fed. R. Civ. P. 26(a)(2)(A).	Date for parties to identify experts and areas of expert testimony on issues for which a party has the burden of proof pursuant to Fed. R. Civ. P. 26(a)(2)(A).
	July 8, 2016	Parties to exchange expert reports.	Parties to exchange expert reports on issues for which a party has the burden of proof.

(b) Parties shall identify rebuttal experts and areas of expert testimony by:

August 19, 2016.

(c) Parties shall exchange rebuttal expert reports concurrently:

September 30, 2016.

(d) All expert depositions shall be completed by:

November 15, 2016.

(e) All expert discovery shall be completed by:

November 15, 2016.

(6) The date by which Plaintiffs will supply their pre-trial order matters to Defendant:

Plaintiffs shall supply their pre-trial order matters to Defendant on November 30, 2016. In the event any party makes a dispositive motion within 21 days after the completion of expert discovery, Plaintiffs shall provide Defendant with pre-trial order matters within 30 days of resolution of such dispositive motion.

(7) The date by which the parties will submit a pre-trial order in a form conforming with the Court's instructions together with trial briefs and either (1) proposed findings of fact and conclusions of law for a non-jury trial, or (2) proposed voir dire questions and proposed jury instructions, for a jury trial:

The parties shall submit a pre-trial order December 30, 2016, or within 30 days of the date that Plaintiffs provide their pre-trial order matters to Defendant.

(8) The date for a final pre-trial conference pursuant to Fed. R. Civ. P. 16(d), to be filled in by the Court at the conference:

IT IS SO ORDERED.

DATED: _____, 2015

SHIRA A. SCHEINDLIN
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

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